

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BARBARA SUZETTE BAKER,

Plaintiff,

V.

Case No. 1:24-CV-228-RP

LLANO COUNTY,

a municipality;

RON CUNNINGHAM,

in his official capacity as Presiding Officer
of the Llano County Commissioners Court,
and his individual capacity;

AMBER MILUM,

in her official capacity as Director of
Llano County Library System,

and her individual capacity;

JERRY DON MOSS, in his individual capacity;

BONNIE WALLACE, in her individual capacity;

ROCHELLE WELLS, in her individual capacity;

RHONDA SCHNEIDER, in her individual capacity;

and, GAY BASKIN, in her individual capacity;

Defendants.

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS’ MOTION TO DISMISS AND REQUEST FOR LEAVE TO EXCEED
THE COURT’S PAGE LIMITATION**

Plaintiff Barbara Suzette Baker, by and through undersigned counsel, hereby files her Unopposed Motion for Extension of Time and Leave to Exceed the Court's Page Limitation. Plaintiff requests an extension of two weeks, up to and including July 9, 2024, to respond to Defendants' Motion to Dismiss. Additionally, Plaintiff requests an additional ten (10) pages for

her response to Defendants' Motion to Dismiss. As grounds in support of her motion, Plaintiff states:

1. Plaintiff filed her Complaint on March 4, 2024. The Complaint is 47 pages in length and includes twelve claims of relief against Defendants.

2. Defendants' responsive pleading was initially due on or before December 18, 2023. Due to the complexity and length of the Complaint, counsel for Defendants requested an extension of time up to and including April 15, 2024.

3. Counsel for Plaintiff did not oppose the extension of time sought by Defendants.

4. Defendants filed a Motion to Dismiss on April 15, 2024 on many of Plaintiff's claims.

5. Plaintiff filed an amended complaint on May 22, 2024, in response to purported deficiencies alleged in Defendants' Motion to Dismiss.

6. Defendants refiled their Motion to Dismiss on June 4, 2024, making Plaintiff's response due on June 25, 2024.

7. This case is complex, implicating the Constitutional, employment, and civil rights of Plaintiff and others in her community and profession. Defendants' Motion to Dismiss is 30-pages. To fully engage in a proper response more preparation and effort than typical is required in this case, thus necessitating additional time to properly brief the issues for the Court at the motion to dismiss stage.

8. Additionally, to fully respond to Defendants' arguments, Plaintiff anticipates she will need approximately ten (10) additional pages for her response.

9. Plaintiff has made diligent effort to meet the Court's page limitation but has concluded that additional pages are needed to fully apprise the Court of her position and address each of Defendants' arguments.

10. No party will be prejudiced if this Court grants this request. Rather, Plaintiff will be prejudiced if required to shorten or eliminate key arguments essential to her response.

11. Counsel for Plaintiff has conferred with counsel for Defendants, and Defendants do not oppose the request for extension of time nor the request for additional pages.

Wherefore, Plaintiff respectfully requests an extension of time to respond to Defendants' Motion to Dismiss of up to and including July 9, 2024. Plaintiff additionally requests leave to exceed the Court's Page limit by ten (10) pages.

DATED: June 21, 2024

/s/ Azra Taslimi

Azra Taslimi*

Iris Halpern*

Qusair Mohamedbhai

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Attorneys for Plaintiff

** Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS AND LEAVE TO EXCEED COURT'S PAGE LIMITATION** has been provided to the counsel on record, via Electronic Service in accordance with the Federal Rules of Civil Procedure, on June 21, 2024.

/s/ Azra Taslimi
Azra Taslimi